

# Exhibit 533

## CERTIFIED TRANSLATION

Message

**From:** Gry Ahlefeld-Engel[/O=TOLDSKAT/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=BF08BE88C46F4231A8D5BC823CD20291-W24045]  
**Sent:** Tue 5/21/2019 7:45:37 PM (UTC)  
**To:** PFI002@politi.dk[PFI002@politi.dk]  
**Cc:** Steen Bechmann Jacobsen[Steen.Jacobsen@SKTST.DK]  
**Subject:** The parties to the settlement agreement  
**Attachments:** Settlement Agreement Exhibits Draft- 5.14.19.docx

Dear Per,

Herewith first and foremost is the list of all the parties covered by our settlement agreement. It is a draft, but I don't expect the list to change. I am still waiting for final approval from the settlement parties for me to send the text of the agreement itself. I hope to have it tomorrow.

It probably doesn't need to be mentioned, but the material must be kept in a very narrow circle, as the Danish Tax Agency is subject to liability if the list is leaked.

//Gry

Best regards

**Gry Ahlefeld-Engel**  
Director  
Antifraud Unit

+45 72 37 36 62

[Gry.Ahlefeld-Engel@SKTST.DK](mailto:Gry.Ahlefeld-Engel@SKTST.DK)



The Danish Tax Agency  
Kratbjerg 236, Fredensborg  
[www.sktst.dk](http://www.sktst.dk)

The Danish Tax Agency is a part of the Danish Tax Administration

Message

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**From:** Gry Ahlefeld-Engel [/O=TOLDSKAT/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=BF08BE88C46F4231A8D5BC823CD20291-W24045]  
**Sent:** 5/21/2019 7:45:37 PM  
**To:** PFI002@politi.dk  
**CC:** Steen Bechmann Jacobsen [steen.jacobsen@sktst.dk]  
**Subject:** Forligsaftalens parter  
**Attachments:** Settlement Agreement Exhibits Draft- 5.14.19.docx

Kære Per,

Hermed først og fremmest listen over samtlige de parter, der er omfattet af vores forligsaftale. Det er et udkast, men jeg forventer ikke, listen ændrer sig. Jeg afventer stadig at få den endelig godkendelse fra forligsparterne på, at jeg må oversende selve aftaleteksten. Jeg håber på, den kommer i morgen.

Det er formentlig unødvendigt at nævne, men materialet skal holdes i en meget snæver kreds, da Skattestyrelsen ifalder ansvar, hvis listen lækkes.

//Gry

Venlig hilsen

**Gry Ahlefeld-Engel**  
Underdirektør  
Kompleks Svig

+45 72 37 36 62

[Gry.Ahlefeld-Engel@SKTST.DK](mailto:Gry.Ahlefeld-Engel@SKTST.DK)

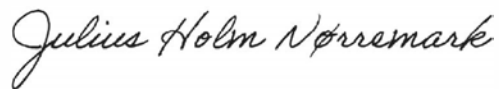


Skattestyrelsen  
Kratbjerg 236, Fredensborg  
[www.sktst.dk](http://www.sktst.dk)

Skattestyrelsen er en del af Skatteforvaltningen

I, the undersigned, Julius Holm Nørremark, certify that I am fluent in both the English and Danish languages and that the preceding text in the English language is to the best of my knowledge and belief a true and faithful translation of the attached exhibit, with the bates stamp SKAT\_MAPLEPOINT\_00000040, in the Danish language.

Copenhagen, 1 April 2025

A handwritten signature in black ink, reading "Julius Holm Nørremark". The signature is written in a cursive style with a large initial 'J'.

Assistant Attorney, LL.M.

□  
**Exhibits to Settlement Agreement**

**Exhibit 1: Covered Parties**

Exhibit 1A: Fully released Pension Plans, pension plan partnerships and partners

Exhibit 1B: Fully released individuals

Exhibit 1C: Partially released individuals

**Exhibit 2: Pension Plans, pension plan partnerships and partners, in which both a Covered Party and one or more other persons or entities who are not Covered Parties have an interest**

**Exhibit 3: Non-exhaustive list of parties excluded from release**

Exhibit 3A: Non-exhaustive list of pension plans excluded from release

Exhibit 3B: Non-exhaustive list of individuals excluded from release

Exhibit 3C: Non-exhaustive list of other entities excluded from release

**Exhibit 4: Affidavit of Confession of Judgment**

**Exhibit 5: Updated Affidavit of Confession of Judgment**

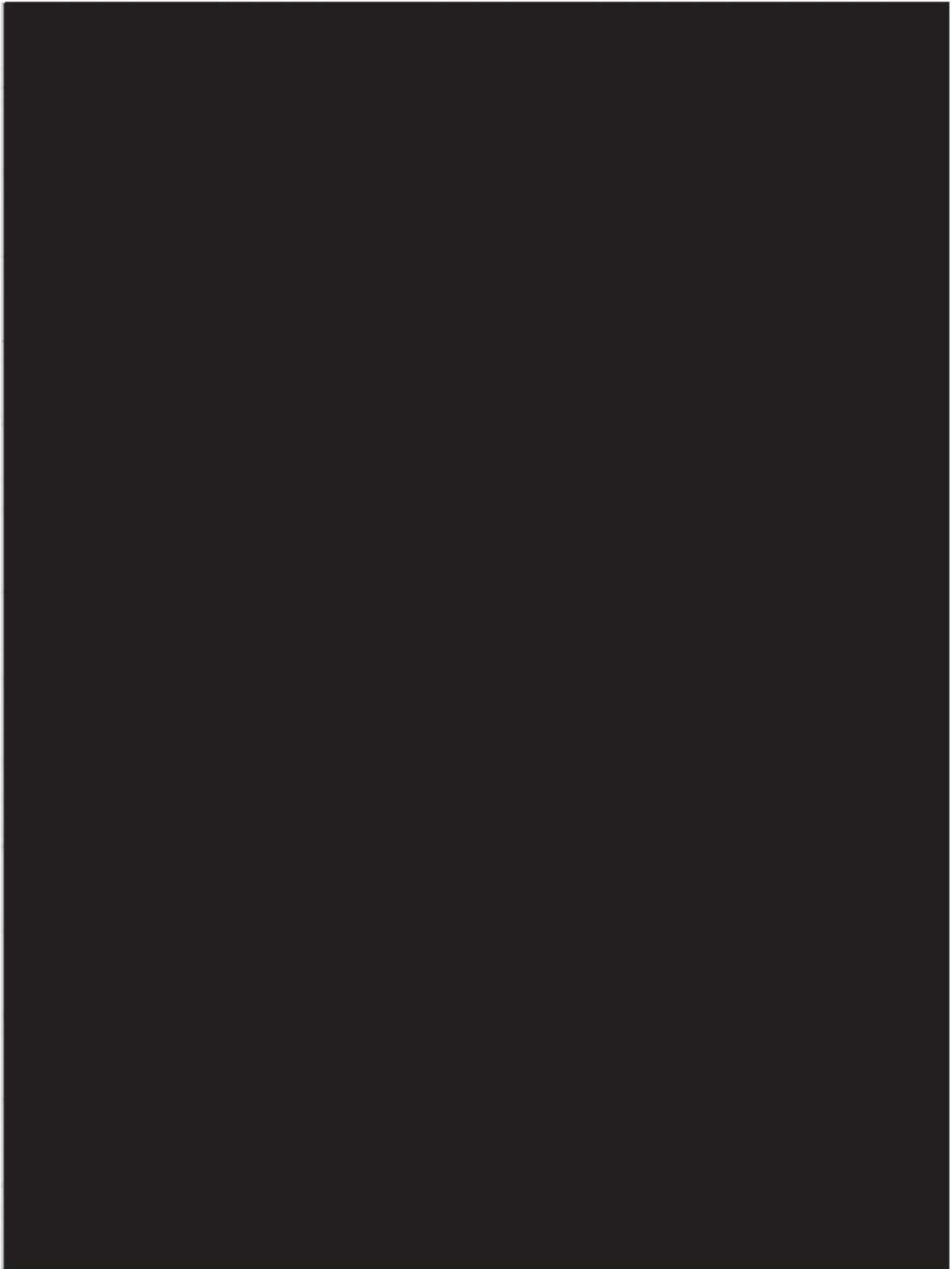
**Exhibit 1: Covered Parties**

**Exhibit 1A: Fully released Pension Plans, pension plan partnerships and partners**

Pension Plans	Partnerships	Partners
[REDACTED]		

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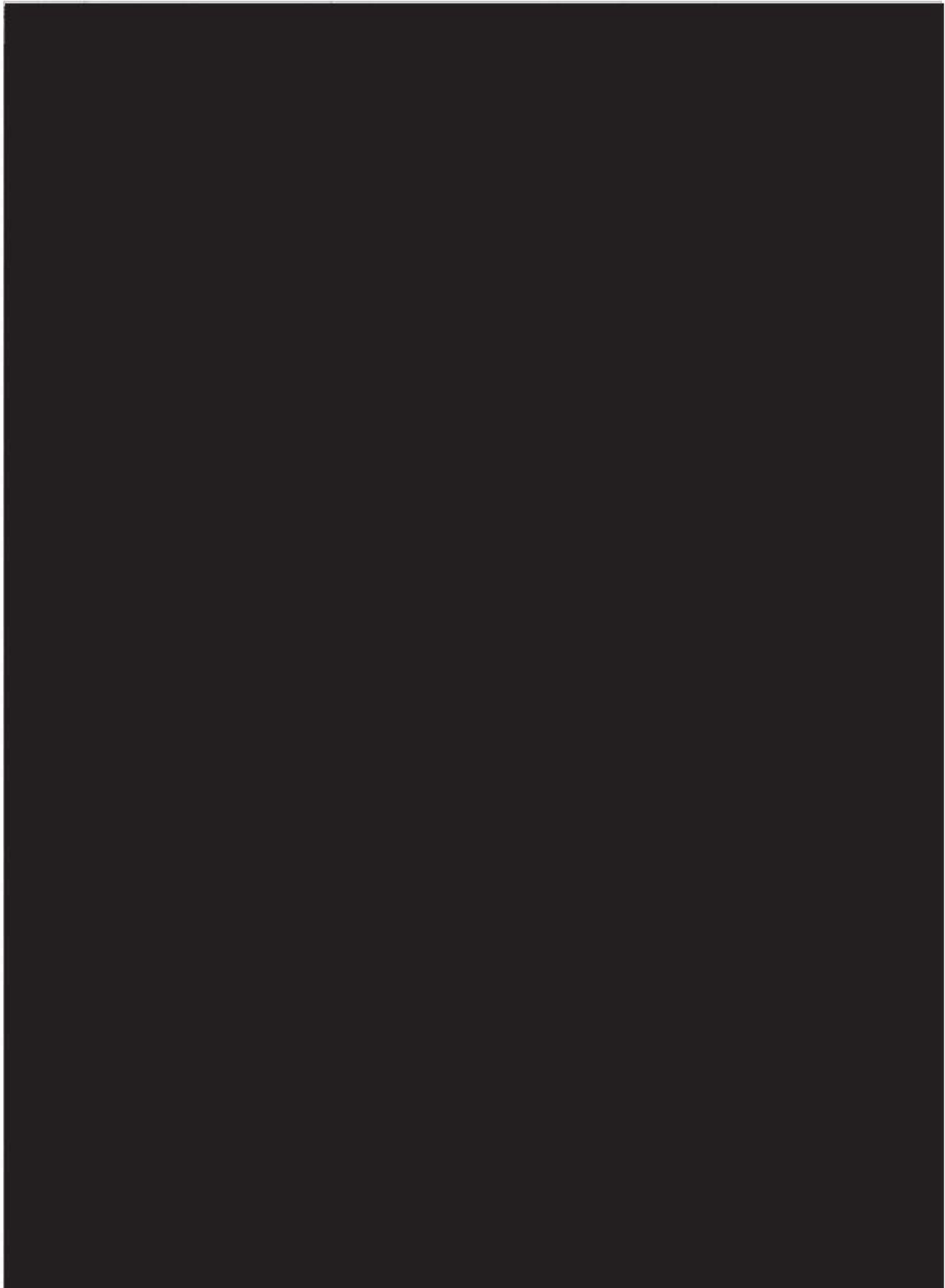
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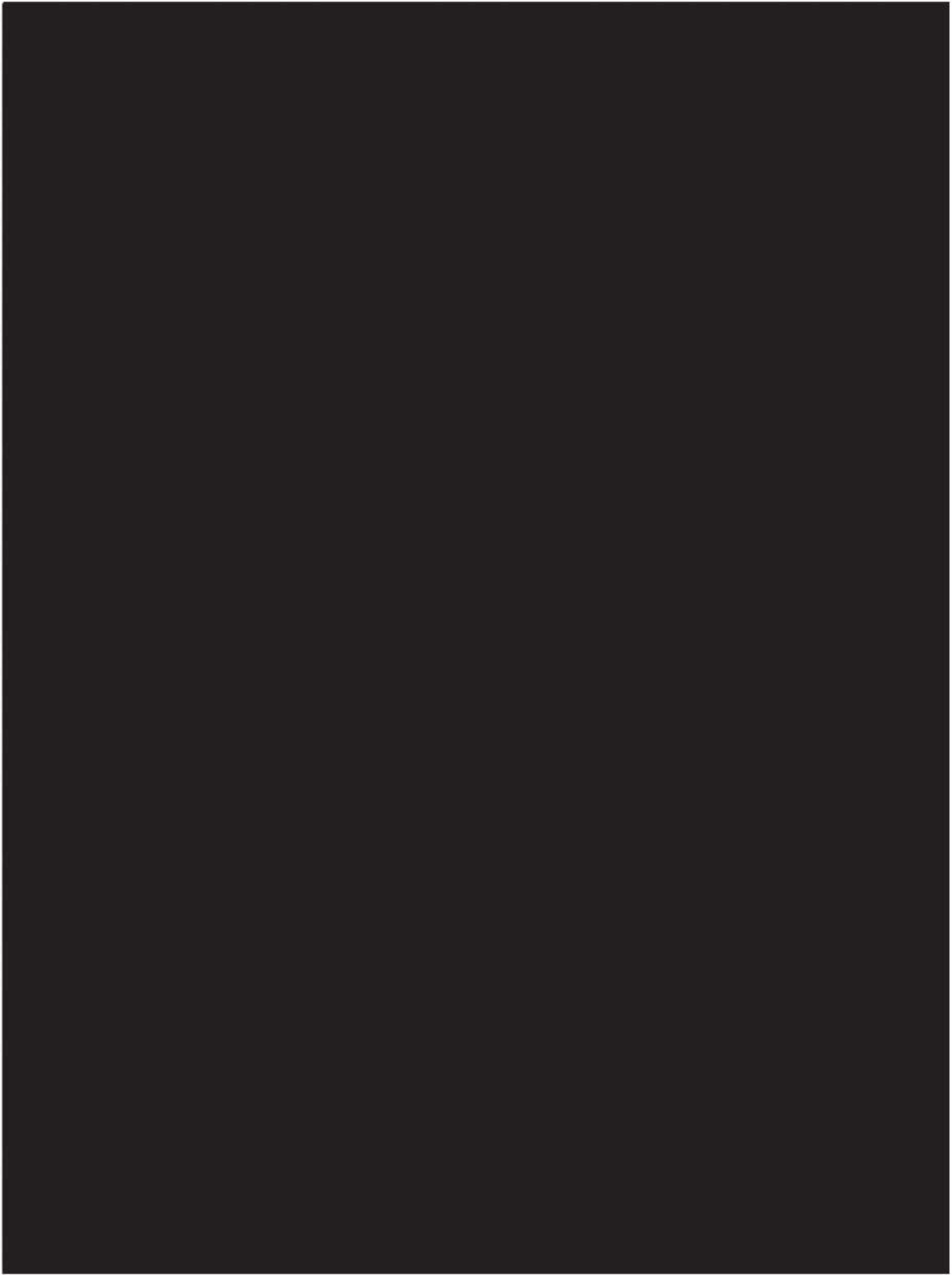
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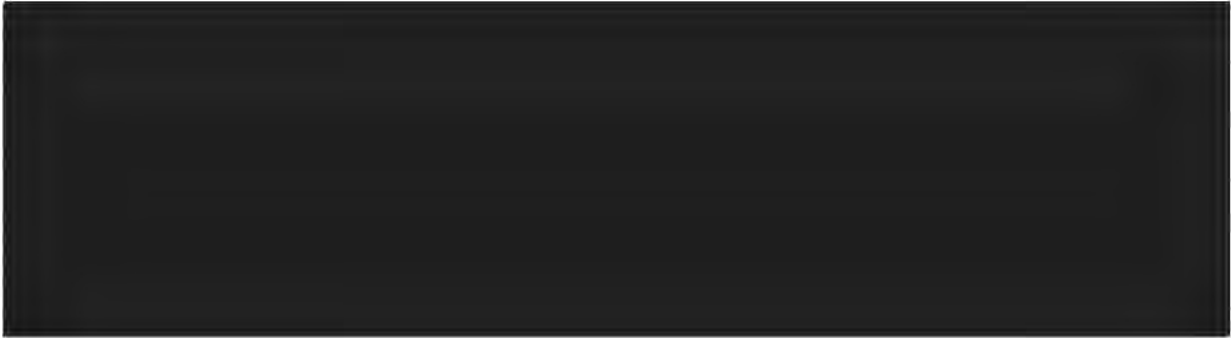
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**Exhibit 1B: Fully released individuals**

Individuals	
28.	Lhote, Jerome and his children
30.	McGee, Luke

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[REDACTED]	
46.	Stein, Matthew
[REDACTED]	

**Exhibit 1C: Partially released individual**

The following individual is partially released, only for his interest in parties listed on Exhibit 2.

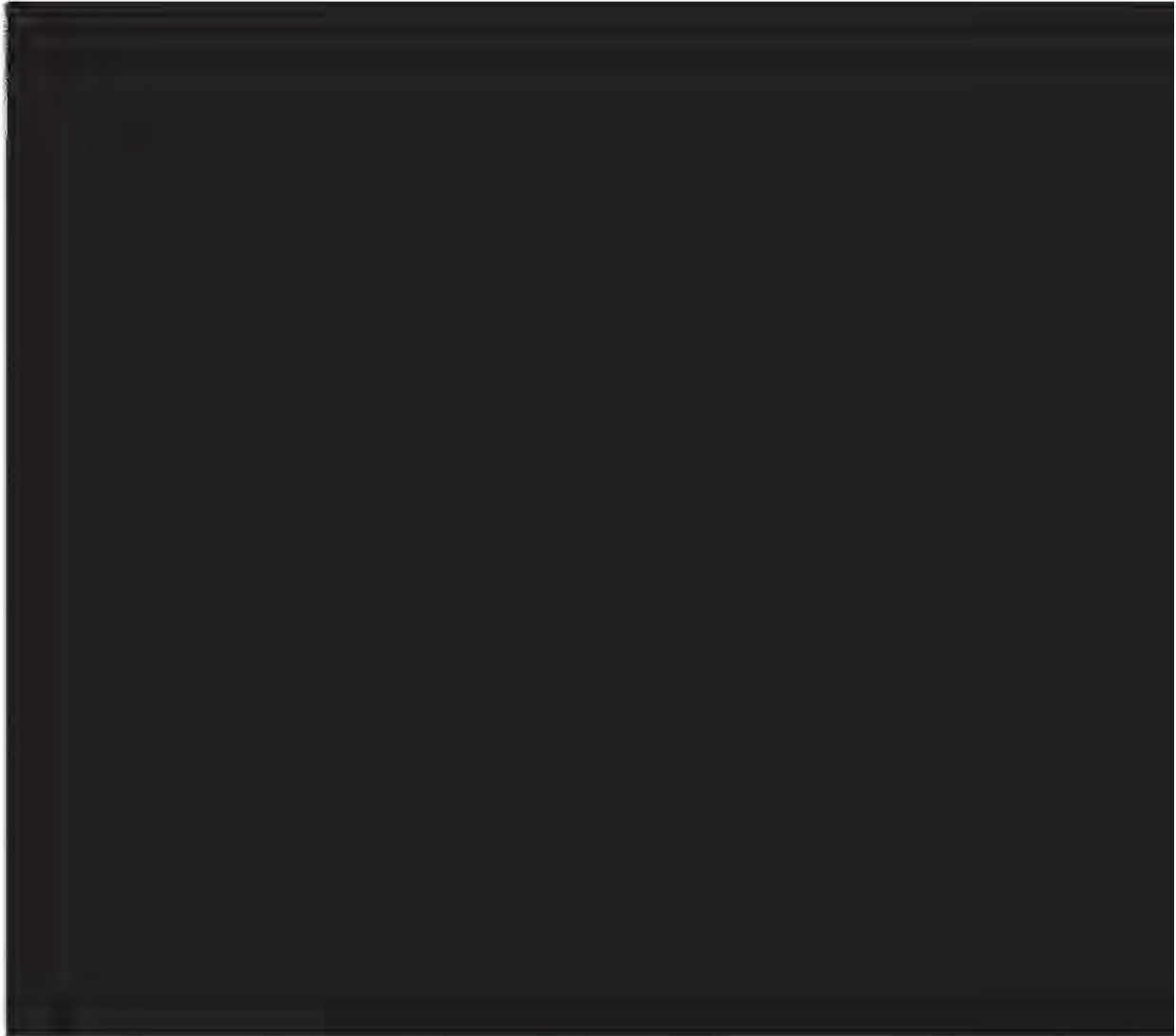
[REDACTED]

**Exhibit 2: Pension Plans, pension plan partnerships and partners, in which both a Covered Party and one or more other persons or entities who are not Covered Parties have an interest**

Pension Plans	Partnerships	Partners*

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\*In all partnerships in which [REDACTED] and [REDACTED] were partners, Bernina Pension Plan and RJM Capital Pension Plan were also partners. Bernina Pension Plan and RJM Capital Pension Plan are not included on this list because no Covered Party has an interest in either of those two plans and those two plans are not released.

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**Exhibit 3: Non-exhaustive list of parties excluded from release****Exhibit 3A: Non-exhaustive list of pension plans excluded from release**

	<b>Pension Plans</b>
<b>1</b>	Albedo Management LLC Roth 401(K) Plan
<b>2</b>	Avanix Management LLC Roth 401(K)
<b>3</b>	Azalea Pension Plan
<b>4</b>	Ballast Ventures LLC Roth 401(K) Plan
<b>5</b>	Bareroot Capital Investments LLC Roth 401(K) Plan
<b>6</b>	Basalt Ventures LLC Roth 401(K) Plan
<b>7</b>	Batavia Capital Pension Plan
<b>8</b>	Battu Holdings LLC Roth 401(K) Plan
<b>9</b>	Bernina Pension Plan
<b>10</b>	Calypso Investments Pension Plan
<b>11</b>	Cantata Industries LLC Roth 401(K) Plan
<b>12</b>	Cavus Systems LLC Roth 401(K) Plan
<b>13</b>	Cedar Hill Capital Investments LLC Roth 401(K) Plan
<b>14</b>	Crucible Ventures LLC Roth 401(K) Plan
<b>15</b>	Dicot Technologies LLC Roth 401(K) Plan
<b>16</b>	Eclouge Industry LLC Roth 401(K) Plan
<b>17</b>	Fairlie Investments LLC Roth 401(K) Plan
<b>18</b>	First Ascent Worldwide LLC Roth 401(K) Plan
<b>19</b>	Fulcrum Productions LLC Roth 401(K) Plan
<b>20</b>	Green Scale Management LLC Roth 401(K) Plan
<b>21</b>	Hadron Industries LLC Roth 401(K) Plan
<b>22</b>	Keystone Technologies LLC Roth 401(K) Plan
<b>23</b>	Limelight Global Productions LLC Roth 401(K) Plan
<b>24</b>	Loggerhead Services LLC Roth 401(K) Plan
<b>25</b>	Monomer Industries LLC Roth 401(K) Plan
<b>26</b>	Omineca Pension Plan
<b>27</b>	PAB Facilities Global LLC Roth 401(K) Plan
<b>28</b>	Pinax Holdings LLC Roth 401(K) Plan
<b>29</b>	Plumrose Industries LLC Roth 401(K) Plan
<b>30</b>	RJM Capital LLC Pension Plan
<b>31</b>	Roadcraft Technologies LLC Roth 401(K) Plan
<b>32</b>	Routt Capital Pension Plan
<b>33</b>	Starfish Capital Management LLC Roth 401(K)Plan
<b>34</b>	Sternway Logistics LLC Roth 401(K) Plan
<b>35</b>	Tarvos Pension Plan
<b>36</b>	Trailing Edge Productions LLC Roth 401(K) Plan

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<b>37</b>	True Wind Investments LLC Roth 401(K) Plan
<b>38</b>	Tumba Systems LLC Roth 401(K) Plan
<b>39</b>	Voojo Productions LLC Roth 401(K) Plan

**Exhibit 3B: Non-exhaustive list of individuals excluded from release**

	<b>Individuals</b>
<b>1</b>	Bellman, Volker
<b>2</b>	Ben-Jacob, Michael
<b>3</b>	Burns, Alexander
<b>4</b>	Altbach, Ronald
<b>5</b>	Herman, Joseph
<b>6</b>	Jablonka, Uwe
<b>7</b>	Jones, Robin
<b>8</b>	Lerner, Perry
<b>9</b>	Markowitz, Jocelyn
<b>10</b>	Markowitz, Richard
<b>11</b>	Van Merkensteijn, Elizabeth
<b>12</b>	Van Merkensteijn, John
<b>13</b>	Zelman, David

**Exhibit 3C: Non-exhaustive list of other entities excluded from release**

	<b>Entity</b>
<b>1</b>	Arnold & Porter Kaye Scholer LLP
<b>2</b>	Bernina LLC
<b>3</b>	RJM Capital LLC

Skatteforvaltningen expressly reserves all rights to pursue all persons and entities for all claims that are not released pursuant to this Settlement Agreement, including but not limited to all claims against defendants that Skatteforvaltningen has sued in the United States, the United Kingdom, Denmark, Dubai, Malaysia, or any other jurisdiction.